

# EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

DEFENSE DISTRIBUTED and  
SECOND AMENDMENT FOUNDATION, INC.,

Plaintiffs,

v.

U.S. DEPARTMENT OF STATE, et al.,

Defendants.

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§ Case No. 15-CV-372-RP  
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**SUPPLEMENTAL DECLARATION OF ALAN GOTTLIEB**

I, Alan Gottlieb, declare:

1. I am a citizen of the United States and a resident of the state of Washington. I make this declaration as a supplement to the declaration I provided earlier for use in the above-referenced case. I make this declaration based on my personal knowledge and, if called upon to do so, could and would testify competently to the matters set forth below.

2. I am the Executive Vice President of the Second Amendment Foundation, Inc. (SAF). SAF is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. SAF has over 650,000 members and supporters nationwide, including Texas. The purposes of SAF include education, research, publishing, and legal action focusing on the constitutional right to privately own and possess firearms, and the consequences of gun control.

3. The issues raised by, and consequences of, Defendants' policies restricting the sharing of firearms-related files over the Internet are of great interest to SAF's constituency.


Were Defense Distributed not prohibited by Defendants from sharing on the Internet its files related to lawful firearms, countless law-abiding, responsible adult SAF members and supporters would access, study, share, modify, and learn from Defense Distributed's various files, and use them to build lawful firearms for self-defense and to keep such firearms operable for self-defense. They would also do this with similar firearms-related CAD files that they or others have created. But for the threats from Defendants of criminal and civil liability, SAF members would create and share CAD files relating to lawful firearms—again, in connection with the building of lawful firearms for self-defense and with maintaining lawful firearms operable for purposes of self-defense.

4. In furtherance of SAF's mission, and to serve its members and the public, SAF would publish and promote, on the Internet, the free distribution of Defense Distributed's various files, and allow its members and others to upload their own firearm-related CAD files to SAF's servers for Internet publication, for purposes of the construction of lawful firearms for self-defense. SAF is presently refraining from doing so only owing to Defendants' interpretation of ITAR, including threats against Defense Distributed of potential criminal and civil liability.

5. SAF is proud to bring this action on behalf of its members. Conn Williamson and Peter Versnel are two of the many members of SAF.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 23<sup>RD</sup> day of June, 2015.

  
Alan Gottlieb